

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DAVIDSON HENAO, et al.,

Plaintiffs,

-against-

PARTS AUTHORITY, LLC., et al.,

Defendants.

19-CV-10720 (LGS) (BCM)

**ORDER**

**BARBARA MOSES, United States Magistrate Judge.**

For the reasons stated on the record during today's discovery conference, it is hereby  
ORDERED that:

1. Proposed Parts Authority Search Terms. With respect to the search terms listed in Dkt. No. 180-9, which were proposed by plaintiffs for search by defendants Parts Authority, Inc. and Parts Authority, LLC (collectively, Parts Authority) across the Parts Authority "G Suite":
  - a. Parts Authority shall pull all results for the proposed searches that yielded a count of 1,000 or less, review the resulting documents, and produce the relevant and non-privileged documents to plaintiffs.
  - b. Plaintiff shall reformat search #15 (relating to Larry Browne) and Parts Authority shall run the reformatted search across the G Suite. If the reformatted search yields a count of 1,000 or less, Parts Authority shall review the resulting documents and produce the relevant and non-privileged documents to plaintiffs.
  - c. For each proposed search that yielded a count of 1,001 or more (as to which plaintiffs have already proposed reformatted searches), Parts Authority shall run those reformatted searches across a reasonable list of individual custodians to be supplied by plaintiffs. Plaintiffs shall endeavor to limit their list to ten custodians for each reformatted search. However, the Court expects the parties to approach this endeavor cooperatively and in good faith, in accordance with Local Civ. R. 26.4, both in developing the custodian list and in demonstrating flexibility where appropriate.
  - d. If necessary, the parties shall continue iteratively to narrow down the proposed searches until agreement is reached, at which point Parts Authority shall review the resulting documents and produce the relevant and non-privileged documents to plaintiffs.

- e. Whenever Parts Authority runs a proposed search, whether over the G Suite or over specified custodians, it shall promptly share the results with plaintiffs, broken down by custodian if possible.
2. ESI Protocol. The parties shall meet and confer in good faith to negotiate an ESI Protocol in accordance with the guidance provided by the Court during today's conference. No later than **November 18, 2021**, the parties shall submit their agreed-upon ESI Protocol to be reviewed and so-ordered by the Court. If they are unable to agree, they shall instead submit a joint letter *briefly* identifying the points of disagreement, without extended argument, and attach the competing drafts, together with a redline showing the differences.

Dated: New York, New York  
November 4, 2021

**SO ORDERED.**



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**BARBARA MOSES**  
**United States Magistrate Judge**